State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

12/3/2009

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No	MODELING SUBMITTED

Dan Lajoie
Sterling Auto Body
9 Tech Circle
NATICK, MA 01760

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677050168
Permit Number: P0105290
Permit Type: Administrative Modification
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

Summit County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Sterling Auto Body

Issue Date: 12/3/2009
Permit Number: P0105290
Permit Type: Administrative Modification
Permit Description: Automotive paint spray booths
Facility ID: 1677050168
Facility Location: Sterling Auto Body
26 E Steels Corner Rd,
Cuyahoga Falls, OH 44223
Facility Description: Automotive Body, Paint, and Interior Repair and Maintenance

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Russell Risley at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Permit Strategy Write-Up

1. Check all that apply:

   _x_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: Sterling Auto Body operates four existing paint spray booths (K001 – K004) in Summit County. Sterling desires to limit the facility's HAP emissions to less than Title V thresholds.

3. Facility Emissions and Attainment Status: This facility emits VOC and HAPs from K001 – K004. While, the facility's potential to emit for VOC is less then Title V thresholds (44.8 tons), both individual and combined HAP emissions are above the 10 tpy and 25 tpy threshold.

4. Source Emissions: Combined emissions from K001 – K004 are 10.2 pounds VOC per hour. Sterling will limit combined annual emissions of VOC to 9.9 tpy, and thus restrict HAP emissions to less than Title V thresholds.

   Conclusion: The terms and conditions in the permit will limit the facility's individual and combined HAPs emissions to less than Title V thresholds. The allowable, VOC emission limitation will be 9.9 tons. Sterling shall maintain records summarizing the facility's emissions. Excursion reports will be required of the facility to ensure compliance.

5. Please provide additional notes or comments as necessary:

   None

6. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	9.9

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Sterling Auto Body

Facility ID:	1677050168
Permit Number:	P0105290
Permit Type:	Administrative Modification
Issued:	12/3/2009
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Sterling Auto Body

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Authorization

Facility ID: 1677050168
Application Number(s): M0000538
Permit Number: P0105290
Permit Description: Automotive paint spray booths
Permit Type: Administrative Modification
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 12/3/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Sterling Auto Body
26 E Steels Corner Rd
Cuyahoga Falls, OH 44223

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0105290
Permit Description: Automotive paint spray booths

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Automotive Paint Spray Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Spray Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Paint Station 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Paint Station 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. **What does this permit-to-install and operate ("PTIO") allow me to do?**

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. **Who is responsible for complying with this permit?**

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. **What records must I keep under this permit?**

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. **What are my permit fees and when do I pay them?**

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. **When does my PTIO expire, and when do I need to submit my renewal application?**

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Automotive Paint Spray Booths: K001, K002, K003, K004,

EU ID	Operations, Property and/or Equipment Description
K001	Spray Booth 1
K002	Spray Booth 2
K003	Spray Booth 3
K004	Spray Booth 4

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. a), b), c), d)(1), e)(1), e)(2), f), and g).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-1740)	Volatile organic compounds (VOC) emissions shall not exceed 10.2 pounds per hour (combined emissions from K001 – K004).
b.	OAC rule 3745-31-05(D)	Combined annual emissions from the entire facility [emissions units K001 – K004] shall not exceed 9.9 tpy VOC, as a rolling, 12-month summation.
c.	OAC rule 3745-21-09(U)(1)	None, pursuant to OAC rule 3745-21-09(U)(2)(c). See c)(1).
d.	OAC rule 3745-21-18(C)	6.5 lbs VOC/gallon of coating, excluding water and exempt solvents (for pretreatment primer) 4.8 lbs VOC/gallon of coating, excluding water and exempt solvents (for primer-surfacer)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		4.6 lbs VOC/gallon of coating, excluding water and exempt solvents (for primer-sealer) 5.0 lbs VOC/gallon of coating, excluding water and exempt solvents [for topcoat(single-stage) and topcoat (two-stage basecoat/clearcoat)] 5.2 lbs VOC/gallon of coating, excluding water and exempt solvents [for topcoat (three or four-stage basecoat/clearcoat)] 5.7 lbs VOC/gallon of coating, excluding water and exempt solvents (for multi-colored topcoat) 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents (for automotive specialty)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) This emissions unit shall only be operated to repaint (refinish) used motor vehicles and trailers.

(2) The permittee shall only use one or more of the following application techniques to apply any coating containing a VOC in this emissions unit:

a. Flow or curtain coating;

b. Dip coating;

c. Roller coating;

d. Brush coating;

e. Cotton-tipped swab application;

f. Electro-deposition coating;

g. HVLP spraying;

h. Electrostatic spray;

i. Airless spray;

j. Air-assisted airless spray; and

k. Any other coating application method that the owner or operator of the facility demonstrates and Ohio environmental protection agency determines achieves emission reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio environmental protection agency. Any equivalent coating application method approved by the director shall be submitted to the USEPA as a revision to the Ohio state implementation plan for ozone.

(3) The permittee shall ensure that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with the manufacturer's specifications, and the handling of a coating and any solvents to clean the conveyor.

(4) The permittee shall ensure that that the spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:

a. An enclosed spray gun cleaning system that is kept closed when not in use;

b. Un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;

c. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and

d. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

(5) The permittee shall store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:

a. Fresh coatings;

b. Used coatings;

c. Solvents;

d. VOC-containing additives and materials;

e. VOC-containing waste materials; and

f. Cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.

(6) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The training program must include, at a minimum, the following items:

a. A list of all current personnel by name and job description who are required to be trained;

b. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:

i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

ii. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

iii. Routine spray booth and filter maintenance, including filter selection and installation.

iv. Environmental compliance with the requirements of this subpart.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly, facility-wide (except where noted) records based on monthly, facility-wide invoice records:

a. the name and identification number of each coating-component , filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;

b. the VOC content of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed, in pounds of VOC per gallon of coating-component, filler, pre-paint cleaner, or any other VOC-containing solvent/material (manufacturer formulation data may be used, provided the VOC contents of all the above facility-invoiced materials have been determined, since January 1, 1991, in accordance with USEPA Method 24, 40 CFR Part 60, Appendix A, or similar approved test method);

c. the solids content of each solids-containing coating-component employed, in pounds of solids per gallon of coating-component (manufacturer formulation data may be used);

d. the number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;

e. the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvents/materials employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the VOC content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed);

f. the total number of hours the facility was in operation;

g. the hourly VOC emissions, in lbs/hr, calculated by dividing the value in (e) by the value in (f) above (i.e., h = e/f); and

h. the rolling 12-month summation of VOC emissions, in TPY.

(2) The permit-to-install and operate (PTIO) application for emissions units K001 – K004 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 10.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2490

MAGLC (ug/m3): 4480

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K001 – K004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(6) The permittee shall submit, within sixty (60) days of receipt of this permit, documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings required in this rule are in use at their facility. The documentation also shall verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. This documentation shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source specified in this permit.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. each month during which the hourly, facility-wide VOC emission exceeded 10.2 lbs/hr; and

ii. each month during which the 12-month rolling summation of facility-wide VOC emissions exceeded 9.9 tons.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit the following information for this emissions unit:

a. documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings are in use; and

b. documentation to verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer.

The documentation shall be submitted by no later than 180 days after the initial operation of this emission unit.

(4) The permittee shall submit a written report to the Director that includes all exceedances of the VOC content of each coating employed in this emissions unit. The report shall be in submitted to the Director within forty-five days after each exceedance is discovered.

(5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

(1) Compliance with the emission limitations in Section 2.b(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

10.2 lbs/hr of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in Section d)(1) of this permit.

If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 18, 40 CFR Part 60, Appendix A.

b. Emission Limitation:

9.9 tpy VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in Section d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.